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Attorneys for Defendants Immersion Corporation,
Victor A. Viegas, Clent Richardson, Stephen
Ambler and Daniel Chavez



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JASON BARRIOS, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

IMMERSION CORPORATION, VICTOR A.
VIEGAS, RALPH EDWARD CLENTON
RICHARDSON, STEPHEN M. AMBLER,
and DANIEL J. CHAVEZ,

Defendants.

Case No. 5:09-cv-04412-JW

CLASS ACTION

**STIPULATION EXTENDING TIME
FOR ALL DEFENDANTS TO RESPOND
TO COMPLAINT**

1 WHEREAS, the above-captioned action, *Barrios v. Immersion Corporation et al.*, filed on
 2 September 18, 2009 (“*Barrios*”), is a proposed class action asserting violations of the federal
 3 securities laws against Defendants Immersion Corporation, Victor A. Viegas, Clent Richardson,
 4 Stephen Ambler and Daniel Chavez (collectively, “Defendants”);

5 WHEREAS, four additional proposed class actions asserting violations of the federal
 6 securities laws against some or all Defendants have been filed in this Court:

7 *Hodges v. Immersion Corporation, et al.*, No. 3:09-cv-04073-MMC, filed on September 2,
 8 2009 (“*Hodges*”);

9 *Posner v. Immersion Corporation, et al.*, Case No. 4:09-cv-04118-PJH, filed on
 10 September 4, 2009 (“*Posner*”);

11 *Buell v. Viegas, et al.*, Case No. 3:09-cv-04561-CRB, filed on September 28, 2009
 12 (“*Buell*”); and

13 *Benson v. Immersion Corporation, et al.*, Case No. 5:09-cv-04744-HRL, filed on October
 14 5, 2009 (“*Benson*”).

15 WHEREAS, the parties in *Barrios* (the “Parties”) believe that *Barrios* and the four actions
 16 listed directly above are “related cases” as defined in Northern District of California Local Rule
 17 (“Civil L.R.”) 3-12(a) and several administrative motions (and responses thereto) regarding such
 18 relation have been filed pursuant to Civil L.R. 3-12(b);

19 WHEREAS, the above-captioned action and the additional actions listed above are subject
 20 to the requirements of the Private Securities Litigation Reform Act of 1995, Pub. L. No. 104-67,
 21 109 Stat. 737 (1995) (the “Reform Act”), which sets forth specialized procedures for the
 22 administration of securities class actions;

23 WHEREAS, the Reform Act provides for the appointment of a lead plaintiff to act on
 24 behalf of the purported class, and further provides that the appointment of lead plaintiff shall not
 25 be made until after a decision on a motion to consolidate is rendered (15 U.S.C. 78u-4
 26 (a)(3)(B)(ii));

27 WHEREAS, the Parties expect that *Hodges*, *Posner*, *Barrios*, *Buell* and *Benson* will be
 28 related by the Court and that a motion to consolidate and for appointment of a lead plaintiff and
 lead counsel will thereafter be filed;

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WHEREAS, Defendants intend to file motions to dismiss the claims asserted against them; and

WHEREAS, because the special procedures specified in the Reform Act contemplate (i) the consolidation of similar actions, (ii) appointment of lead plaintiff, and (iii) the filing of a single consolidated complaint by lead plaintiff and counsel to be appointed by the Court, requiring Defendants to respond to the initial complaints in the above-referenced actions would serve no purpose and would result in the needless expenditure of private and judicial resources;

IT IS ACCORDINGLY STIPULATED, pursuant to Civil L.R. 6-1(a), by and between the undersigned counsel for the Parties, that the time for each Defendant to answer, move or otherwise respond to the *Barrios* complaint is extended until following the appointment of a lead plaintiff and lead counsel and that, thereafter, the parties shall meet and confer and submit a mutually agreeable schedule for the filing of a consolidated complaint (or designation of an operative complaint), if necessary, as well as for the briefing and hearing of responses thereto. The consolidated or operative complaint shall supersede all complaints filed in any action that is consolidated herein.

Pursuant to General Order No. 45 Section X(B), all of the signatories concur in the filing of this stipulation.

Dated: October 9, 2009

FENWICK & WEST LLP

By: /s/ Jay L. Pomerantz
Jay L. Pomerantz

Attorneys for Defendants Immersion
Corporation, Victor A. Viegas, Clent
Richardson, Stephen Ambler and Daniel Chavez

Dated: October 9, 2009

BARROWAY TOPAZ KESSLER
MELTZER & CHECK, LLP

By: /s/ Erik D. Peterson
Erik D. Peterson

Attorneys for Plaintiff Jason Barrios

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